

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

XR COMMUNICATIONS, LLC, dba
VIVATO TECHNOLOGIES,

Plaintiff,

v.

AT&T SERVICES INC.; AT&T MOBILITY
LLC; and AT&T CORP.,

Defendants,

NOKIA OF AMERICA CORPORATION and
ERICSSON INC.,

Intervenors.

Case No. 2:23-cv-00202-JRG-RSP
(Lead Case)

JURY TRIAL DEMANDED

**DECLARATION OF MINNA JAY IN SUPPORT OF OPPOSITION TO DEFENDANTS'
MOTION FOR LEAVE TO SUPPLEMENT INVALIDITY CONTENTIONS**

I, Minna Jay, declare and state as follows:

1. I am a member of the State Bar of California, an attorney at the firm of Russ, August & Kabat, and counsel of record for Plaintiff XR Communications, LLC, in the above-captioned actions. I have personal knowledge of the facts set forth herein, and if called upon to testify, I could and would testify competently thereto.

2. Attached as Exhibit A is a true and correct copy of Plaintiff's Proposed Claim Constructions and Extrinsic Evidence, served on May 15, 2024.

3. Attached as Exhibit B is a true and correct copy of Patent Owner Preliminary Response, IPR2024-00314, filed on April 22, 2024.

4. Attached as Exhibit C is a true and correct copy of Defendants' December 3, 2024 email to XR Disclosing the Keller Reference.

5. Attached as Exhibit D is a true and correct copy of Defendants' Exhibit E-01

Invalidity Chart, served on October 12, 2023.

6. Attached as Exhibit E is a true and correct copy of Defendants' Exhibit E-02 Invalidity Chart, served on October 12, 2023.

7. Attached as Exhibit F is a true and correct copy of Defendants' Exhibit E-03 Invalidity Chart, served On October 12, 2023.

8. Attached as Exhibit G is a true and correct copy of Defendants' Exhibit E-04 Invalidity Chart, served on October 12, 2023.

9. Attached as Exhibit H is a true and correct copy of Defendants' Exhibit E-05 Invalidity Chart, served on October 12, 2023.

10. Attached as Exhibit I is a true and correct copy of Defendants' Exhibit E-06 Invalidity Chart, served on October 12, 2023.

11. Attached as Exhibit J is a true and correct copy of Defendants' Exhibit E-07 Invalidity Chart, served On October 12, 2023.

12. Attached as Exhibit K is a true and correct copy of Defendants' Exhibit E-08 Invalidity Chart, served on October 12, 2023.

13. Attached as Exhibit L is a true and correct copy of Defendants' Exhibit E-09 Invalidity Chart, served on October 12, 2023.

14. Attached as Exhibit M is a true and correct copy of Defendants' Exhibit E-10 Invalidity Chart, served on October 12, 2023.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on January 17, 2025 at Austin, Texas.

/s/ Minna Jay
Minna Jay